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October 31, 2022

Via ECF

Honorable Philip M. Halpern
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: *Constant v. Dapcevic, et al.*
Docket No. 16-cv-3985 (PMH)
File No. 130065

Your Honor:

This firm represents plaintiff William Constant in this action. We write, concerning an issue that just arose. Based on conversations with the defense counsel, we understood that they were securing the attendance of all defense witnesses listed on the JPTO, including Correction Officer Michael Vennero, who is listed on both parties' witness lists. Defense counsel Andrew Blancato informs me that the defendants are not calling Officer Vennero and, therefore, we are required to subpoena him. We respectfully request that the Court expeditiously so-order the attached subpoena. We will then provide it to the defense counsel, who indicated he will facilitate its service at Marcy Correctional Facility, where Mr. Vennero works.

We thank the Court for its assistance with this matter.

Respectfully submitted,

SOKOLOFF STERN LLP

STEVEN C. STERN

cc:

All Counsel [via ECF]